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Pro Hac Vice

*Attorneys for Plaintiff Nuclear Care Partners,
LLC*

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

NUCLEAR CARE PARTNERS, LLC, a Nevada
limited liability company,

Plaintiff,

vs.

RUBEN MENDOZA, an individual; STEPHEN
BURR, an individual; and ATOMIC WORKERS
ALLIANCE, LLC, a Tennessee limited liability
company

Case No.: 2:24-cv-01441-DJA

**STIPULATION AND ORDER
EXTENDING TIME FOR PLAINTIFF
TO PROVIDE REPLY IN
SUPPORT OF MOTION FOR
TEMPORARY RESTRAINING ORDER
(FIRST REQUEST)**

Plaintiff Nuclear Care Partners, LLC (“NCP”), and Defendant Stephen Burr (“Burr”), by
and through their counsel of record, hereby stipulate as follows:

1. NCP, Defendant Atomic Workers Alliance, LLC and Burr are continuing
discussions in good faith to fully resolve this matter without further judicial involvement. The
parties have exchanged draft settlement documentation and are making meaningful progress
towards a potential final resolution. As a result of their on-going progress, the parties would like
to continue settlement efforts before moving forward with litigation, including the costs associated

1 with motion practice.

2 2. The parties are committed to devoting resources to potential resolution at this
3 stage.

4 3. Accordingly, NCP and Burr stipulate to continue the deadline for NCP to file a
5 reply in support of its Motion for Temporary Restraining Order (ECF No. 7) from January 20,
6 2025, to February 3, 2025.

7 4. This is the Parties' first request for an extension.

8
9 IT IS SO STIPULATED.

10 DATED this 20th day of January, 2025

11 Submitted by:

12
13 By: /s/ Benjamin M. Wegener

14 Michael M. Edwards, Esq.

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25 Pro Hac Vice Pending

26 **ORDER**

Counsel for Plaintiff

27 IT IS SO ORDERED.

-and-

28 Dated this 21 day of January, 2025.

/s/ Todd J. Dressel

Todd J. Dressel, Esq.

McGuireWoods LLP

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San Francisco, CA 94111

*Counsel for Defendant Atomic Workers Alliance,
LLC and Stephen Burr*


Gloria M. Navarro
U.S. District Judge

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CERTIFICATE OF SERVICE

The undersigned, an employee of the law firm of Wegener Lane & Evans, P.C. hereby certifies that on this 20th day of January, 2025, she served a copy of the foregoing via electronic service through the United States District Court for the District of Nevada's ECF System upon each party in the case is registered as an electronic case filing user with the Clerk:

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